

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Willie Earl Edward, Debtor

Case No. 25-01545-KMS
CHAPTER 13

**NOTICE OF FILING CHAPTER 13 PLAN AND MOTIONS FOR VALUATION AND
LIEN AVOIDANCE**

The above-named Debtor has filed a *Chapter 13 plan and Motions for Valuation and Lien Avoidance* (the “Plan”) with the Bankruptcy Court in the above referenced case (see attachment).

Any objection to confirmation of the Plan or the motions contained therein shall be filed in writing with the Clerk of Court at Thad Cochran U.S. Courthouse 501 E. Court Street Suite 2.300 Jackson, MS 39201 on or before August 13, 2025. Copies of the objection must be served on the Trustee, US Trustee, Debtor, and Attorney for Debtor.

Objections to confirmation will be heard and confirmation determined on August 28, 2025 at 10:00 AM in the United States Courthouse, 109 South Pearl Street, Courtroom 1, Natchez, MS 39120, unless the court orders otherwise. If no objection is timely filed, the Plan may be confirmed without a hearing.

Date: June 26, 2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

Fill in this information to identify your case:

Debtor 1 Willie Earl Edward
Full Name (First, Middle, Last)

Debtor 2
(Spouse, if filing) Full Name (First, Middle, Last)

United States Bankruptcy Court for the SOUTHERN DISTRICT OF MISSISSIPPI

Case number:
(If known) _____

☐ Check if this is an amended plan, and list below the sections of the plan that have been changed.

Chapter 13 Plan and Motions for Valuation and Lien Avoidance

12/17

Part 1: Notices

To Debtors: This form sets out options that may be appropriate in some cases, but the presence of an option on the form does not indicate that the option is appropriate in your circumstances or that it is permissible in your judicial district. Plans that do not comply with local rules and judicial rulings may not be confirmable. The treatment of ALL secured and priority debts must be provided for in this plan.

In the following notice to creditors, you must check each box that applies

To Creditors: Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated.

You should read this plan carefully and discuss it with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you oppose the plan's treatment of your claim or any provision of this plan, you or your attorney must file an objection to confirmation on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I). The Bankruptcy Court may confirm this plan without further notice if no objection to confirmation is filed. See Bankruptcy Rule 3015.

The plan does not allow claims. Creditors must file a proof of claim to be paid under any plan that may be confirmed.

The following matters may be of particular importance. Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

1.1	A limit on the amount of a secured claim, set out in Section 3.2, which may result in a partial payment or no payment at all to the secured creditor	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
1.2	Avoidance of a judicial lien or nonpossessory, nonpurchase-money security interest, set out in Section 3.4.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included
1.3	Nonstandard provisions, set out in Part 8.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included

Part 2: Plan Payments and Length of Plan**2.1 Length of Plan.**

The plan period shall be for a period of 60 months, not to be less than 36 months or less than 60 months for above median income debtor(s). If fewer than 60 months of payments are specified, additional monthly payments will be made to the extent necessary to make the payments to creditors specified in this plan.

2.2 Debtor(s) will make payments to the trustee as follows:

Debtor shall pay \$775.38 (☐ monthly, ☐ semi-monthly, ☐ weekly, or ☒ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the debtor's employer at the following address:

Claiborne County Board of Supervisors
PO Box 689
Port Gibson MS 39150-0000

Debtor Willie Earl Edward Case number _____

Joint Debtor shall pay ____ (☐ monthly, ☐ semi-monthly, ☐ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the joint debtor's employer at the following address:

2.3 Income tax returns/refunds.

Check all that apply

- ☒ Debtor(s) will retain any exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will supply the trustee with a copy of each income tax return filed during the plan term within 14 days of filing the return and will turn over to the trustee all non-exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will treat income refunds as follows:

2.4 Additional payments.

Check one.

- ☒ **None.** If "None" is checked, the rest of § 2.4 need not be completed or reproduced.

Part 3: Treatment of Secured Claims

3.1 Mortgages. (Except mortgages to be crammed down under 11 U.S.C. § 1322(c)(2) and identified in § 3.2 herein.).

Check all that apply.

- ☒ **None.** If "None" is checked, the rest of § 3.1 need not be completed or reproduced.

Insert additional claims as needed.

3.2 Motion for valuation of security, payment of fully secured claims, and modification of undersecured claims. Check one..

- ☐ **None.** If "None" is checked, the rest of § 3.2 need not be completed or reproduced.
The remainder of this paragraph will be effective only if the applicable box in Part 1 of this plan is checked.
- ☒ Pursuant to Bankruptcy Rule 3012, for purposes of 11 U.S.C. § 506(a) and § 1325(a)(5) and for purposes of determination of the amounts to be distributed to holders of secured claims, debtor(s) hereby move(s) the court to value the collateral described below at the lesser of any value set forth below or any value set forth in the proof of claim. Any objection to valuation shall be filed on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I).

The portion of any allowed claim that exceeds the amount of the secured claim will be treated as an unsecured claim under Part 5 of this plan. If the amount of a creditor's secured claim is listed below as having no value, the creditor's allowed claim will be treated in its entirety as an unsecured claim under Part 5 of this plan. Unless otherwise ordered by the court, the amount of the creditor's total claim listed on the proof of claim controls over any contrary amounts listed in this paragraph.

Name of creditor	Estimated amount of creditor's total claim #	Collateral	Value of collateral	Amount of secured claim	Interest rate*
Heights Finance Hold	\$10,799.00	2015 Chevrolet Silverado 1500 130,335 miles	\$18,866.00	\$10,799.00	10.00%

Insert additional claims as needed.

#For mobile homes and real estate identified in § 3.2: Special Claim for taxes/insurance:

Name of creditor	Collateral	Amount per month	Beginning
-NONE-			month

* Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District

Debtor Willie Earl Edward Case number _____

For vehicles identified in § 3.2: The current mileage is _____

3.3 Secured claims excluded from 11 U.S.C. § 506.

Check one.

☒ **None.** If “None” is checked, the rest of § 3.3 need not be completed or reproduced.

3.4 Motion to avoid lien pursuant to 11 U.S.C. § 522.

Check one.

☒ **None.** If “None” is checked, the rest of § 3.4 need not be completed or reproduced.

3.5 Surrender of collateral.

Check one.

☐ **None.** If “None” is checked, the rest of § 3.5 need not be completed or reproduced.

☒ The debtor(s) elect to surrender to each creditor listed below the collateral that secures the creditor’s claim. The debtor(s) request that upon confirmation of this plan the stay under 11 U.S.C. § 362(a) be terminated as to the collateral only and that the stay under § 1301 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in Part 5 below.

Name of Creditor	Collateral
1st Franklin	Household Goods
Family Choice Financia	Household Goods
Security Finance	Household Goods
World Finance Corp	Household Goods

Insert additional claims as needed.

Part 4: Treatment of Fees and Priority Claims

4.1 General

Trustee’s fees and all allowed priority claims, including domestic support obligations other than those treated in § 4.5, will be paid in full without postpetition interest.

4.2 Trustee’s fees

Trustee’s fees are governed by statute and may change during the course of the case.

4.3 Attorney’s fees.

☒ No look fee: 4,600.00

Total attorney fee charged: \$4,600.00

Attorney fee previously paid: \$272.00

Attorney fee to be paid in plan per confirmation order: \$4,328.00

☐ Hourly fee: \$____. (Subject to approval of Fee Application.)

4.4 Priority claims other than attorney’s fees and those treated in § 4.5.

Check one.

☒ **None.** If “None” is checked, the rest of § 4.4 need not be completed or reproduced.

4.5 Domestic support obligations.

Debtor **Willie Earl Edward** Case number _____

☒ **None.** If "None" is checked, the rest of § 4.5 need not be completed or reproduced.

Part 5: Treatment of Nonpriority Unsecured Claims

5.1 Nonpriority unsecured claims not separately classified.

Allowed nonpriority unsecured claims that are not separately classified will be paid, pro rata. If more than one option is checked, the option providing the largest payment will be effective. *Check all that apply.*

- ☒ The sum of \$ **74,933.81**
☐ _____% of the total amount of these claims, an estimated payment of \$ _____
☒ The funds remaining after disbursements have been made to all other creditors provided for in this plan.

If the estate of the debtor(s) were liquidated under chapter 7, nonpriority unsecured claims would be paid approximately **\$2,000.25**. Regardless of the options checked above, payments on allowed nonpriority unsecured claims will be made in at least this amount.

5.2 Other separately classified nonpriority unsecured claims (special claimants). Check one.

☒ **None.** If "None" is checked, the rest of § 5.3 need not be completed or reproduced.

Part 6: Executory Contracts and Unexpired Leases

6.1 The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory contracts and unexpired leases are rejected. Check one.

☒ **None.** If "None" is checked, the rest of § 6.1 need not be completed or reproduced.

Part 7: Vesting of Property of the Estate

7.1 Property of the estate will vest in the debtor(s) upon entry of discharge.

Part 8: Nonstandard Plan Provisions

8.1 Check "None" or List Nonstandard Plan Provisions

☒ **None.** If "None" is checked, the rest of Part 8 need not be completed or reproduced.

Part 9: Signatures:

9.1 Signatures of Debtor(s) and Debtor(s)' Attorney

The Debtor(s) and attorney for the Debtor(s), if any, must sign below. If the Debtor(s) do not have an attorney, the Debtor(s) must provide their complete address and telephone number.

X /s/ Willie Earl Edward
Willie Earl Edward
 Signature of Debtor 1

X _____
 Signature of Debtor 2

Executed on **June 23, 2025**

Executed on _____

94 Brady Ave
 Address
Port Gibson MS 39150-0000
 City, State, and Zip Code

 Address

 City, State, and Zip Code

 Telephone Number

 Telephone Number

X /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. 103469

Date **June 23, 2025**

Debtor Willie Earl Edward Case number _____

Signature of Attorney for Debtor(s)

P.O. Box 13767

Jackson, MS 39236

Address, City, State, and Zip Code

601-500-5533

Telephone Number

trollins@therollinsfirm.com

Email Address

103469 MS

MS Bar Number

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., attorney for the Debtor, do hereby certify that by filing the attached Notice and Chapter 13 Plan, I have caused the following parties to be served electronically via ECF:

Case Trustee
Office of the US Trustee

I certify that I have this day served a true and correct copy of the attached Notice and Chapter 13 Plan by US Mail¹, postage prepaid, to the following creditor(s) listed in Sections 3.2 and/or 3.4 of the Plan pursuant to Fed. R. Bankr. P. 7004:

Heights Finance Holding
c/o Corporation Service Company
109 Executive Drive, Suite 3
Madison, MS 39110

I further certify that I have this day served a true and correct copy of the Notice and Chapter 13 Plan by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix).

Date: June 26, 2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

¹ If the creditor is an insured depository institution, service has been made by certified mail.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

WILLIE EARL EDWARD

CASE NO: 25-01545

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 6/26/2025, I did cause a copy of the following documents, described below,
Notice and Plan

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/26/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
WILLIE EARL EDWARD

CASE NO: 25-01545

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 6/26/2025, a copy of the following documents, described below,
Notice and Plan

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/26/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

HEIGHTS FINANCE HOLDING
CO CORPORATION SERVICE COMPANY
109 EXECUTIVE DRIVE SUITE 3
MADISON MS 39110

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 25-01545
SOUTHERN DISTRICT OF MISSISSIPPI
THU JUN 26 8-11-14 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT~~
~~THAD COCHRAN US COURTHOUSE~~
~~501 E COURT STREET~~
~~SUITE 2300~~
~~JACKSON MS 39201 5036~~

1ST FRANKLIN
124 MARKET PLACE
HAZLEHURST MS 39083-2205

ADVANCE AMERICA
2314 IOWA BLVD
STE 200
VICKSBURG MS 39180-5999

ASPIRE CREDIT CARD
ATTN BANKRUPTCY
PO BOX 105555
ATLANTA GA 30348-5555

CRANE FINANCIAL
PO BOX 477
KESHENA WI 54135-0477

CREDIT ONE
PO BOX 98872
LAS VEGAS NV 89193-8872

EDFINANCIAL SERVICES L
120 N SEVEN OAKS DRIVE
KNOXVILLE TN 37922-2359

(P)FAMILY CHOICE FINANCIAL
3208 SERVICE DRIVE
SUITE E
PEARL MS 39208-3539

(P)EAGLE LENDING LLC DBA FINEDAY FUNDS
PO BOX 457
KESHENA WI 54135-0457

FIRST PREMIER BANK
3820 N LOUISE AVE
SIOUX FALLS SD 57107-0145

GENESIS FS CARD SERV
ATTN BANKRUPTCY
PO BOX 4477
BEAVERTON OR 97076-4401

HAZELHURST FINANCIAL
256 CALDWELD DR
HAZLEHURST MS 39083-2723

HEIGHTS FINANCE HOLD
ATTN BANKRUPTCY
PO BOX 1947
GREENVILLE SC 29602-1947

LENDUMO
PO BOX 542
LAC DU FLAMBE WI 54538-0542

MERRICK BANK CORP
PO BOX 9201
OLD BETHPAGE NY 11804-9001

MONEY KEY
1000 N WEST ST
STE 1200
WILMINGTON DE 19801-1058

NETCREDIT
ATTN BANKRUPTCY
175 W JACKSON BLVD
STE 100
CHICAGO IL 60604-3043

SCIL INC
15 BULL ST SUITE 200
SAVANNAH GA 31401-2686

SECURITY FINANCE
ATTN BANKRUPTCY
PO BOX 3146
SPARTANBURG SC 29304-3146

SPEEDY CASH
2312 TRINITY MILL RD
SUITE 100
CARROLLTON TX 75006-1955

(P)BLUECHIP FINANCIAL D B A SPOTLOAN
P O BOX 720
BELCOURT ND 58316-0720

(P)LOON LENDING LLC DBA TODAY CASH
PO BOX 808
KESHENA WI 54135-0808

~~EXCLUDE~~

~~UNITED STATES TRUSTEE~~
~~501 EAST COURT STREET~~
~~SUITE 6 430~~
~~JACKSON MS 39201 5022~~

WORLD FINANCE CORP
POBOX 6429
GREENVILLE SC 29606-6429

~~EXCLUDE~~

~~(P)DAVID RAWLINGS~~
~~ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE~~
~~PO BOX 566~~
~~HATTIESBURG MS 39403 0566~~

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~

DEBTOR

WILLIE EARL EDWARD
PO BOX 58
PORT GIBSON MS 39150-0058